

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

IN RE:)
KAREN L. POOLE,) Chapter 13
Debtor.) Case No.: 18-01760-dd

KAREN L. POOLE,)
Plaintiff,)
v.) Adversary Case No. 19-80030-dd
TITLEMAX OF SOUTH CAROLINA)
d/b/a TITLEMAX,) **ANSWER**
Defendant.)

COMES NOW TITLEMAX OF SOUTH CAROLINA d/b/a TITLEMAX and files its answer to Plaintiff's complaint and shows as follows:

1. Defendant admits the allegations contained in this paragraph.
2. Defendant admits the allegations contained in this paragraph.
3. Defendant admits the allegations contained in this paragraph but clarifies that the parties entered into a limited recourse agreement pursuant to its terms and S.C. Code Ann. Section 31-3-101 *et seq.*
4. Defendant admits the allegations contained in this paragraph.
5. Defendant admits the allegations contained in this paragraph.
6. Defendant admits the allegations contained in this paragraph.
7. Defendant admits the allegations contained in this paragraph.
8. Defendant admits the allegations contained in this paragraph.
9. Defendant admits the allegations contained in this paragraph.

10. Defendant admits the allegations contained in this paragraph.
11. Defendant admits the allegations contained in this paragraph.
12. Defendant lacks sufficient knowledge to ascertain the truth of the matter alleged in this paragraph therefore denies the same.
13. Defendant lacks sufficient knowledge to ascertain the truth of the matter alleged in this paragraph therefore denies the same.
14. Defendant lacks sufficient knowledge to ascertain the truth of the matter alleged in this paragraph therefore denies the same.
15. Defendant lacks sufficient knowledge to ascertain the truth of the matter alleged in this paragraph therefore denies the same.
16. Defendant admits the allegations contained in this paragraph.
17. Defendant admits the allegations contained in this paragraph.
18. Defendant denies the allegations contained in this paragraph.
19. Defendant hereby incorporates each and every paragraph listed above as if fully set forth herein verbatim.
20. Defendant denies the allegations contained in this paragraph.
21. Defendant denies the allegations contained in this paragraph.
22. Defendant lacks sufficient knowledge to ascertain the truth of the matter alleged in this paragraph therefore denies the same.
23. Defendant lacks sufficient knowledge to ascertain the truth of the matter alleged in this paragraph therefore denies the same.
24. Defendant denies the allegations contained in this paragraph.
25. Defendant denies the allegations contained in this paragraph.

26. Defendant hereby incorporates each and every paragraph listed above as if fully set forth herein verbatim.
27. Defendant denies the allegations contained in this paragraph.
28. Defendant denies the allegations contained in this paragraph.
29. Defendant denies the allegations contained in this paragraph.
30. Defendant hereby incorporates each and every paragraph listed above as if fully set forth herein verbatim.
31. Defendant admits that it has a statewide presence. Defendant denies the remaining allegations contained in this paragraph.
32. Defendant denies the allegations contained in this paragraph.
33. Defendant denies the allegations contained in this paragraph.
34. Defendant denies the allegations contained in this paragraph.
35. Defendant denies the allegations contained in this paragraph.
36. Defendant denies the allegations contained in this paragraph.
37. Defendant denies the allegations contained in this paragraph.
38. Defendant hereby incorporates each and every paragraph listed above as if fully set forth herein verbatim.
39. The allegations contained in this paragraph are legal conclusions that do not require an admission or denial, therefore Defendant denies the same.
40. Defendant denies the allegations contained in this paragraph.
41. Defendant denies the allegations contained in this paragraph.
42. Defendant denies the allegations contained in this paragraph.

43. Defendant hereby incorporates each and every paragraph listed above as if fully set forth herein verbatim.
44. Defendant denies the allegations contained in this paragraph.
45. Defendant denies the allegations contained in this paragraph.
46. Defendant hereby incorporates each and every paragraph listed above as if fully set forth herein verbatim.
47. Defendant denies the allegations contained in this paragraph.
48. Defendant denies the allegations contained in this paragraph.
49. Defendant denies the allegations contained in this paragraph.
50. Defendant hereby incorporates each and every paragraph listed above as if fully set forth herein verbatim.
51. Defendant denies the allegations contained in this paragraph.
52. Defendant denies the allegations contained in this paragraph.
53. Defendant denies the allegations contained in this paragraph.
54. Defendant denies the allegations contained in this paragraph.
55. Defendant denies the allegations contained in this paragraph.
56. Defendant denies the allegations contained in this paragraph.
57. Defendant denies the allegations contained in this paragraph.
58. Defendant denies the allegations contained in this paragraph.
59. Defendant denies the allegations contained in this paragraph.
60. Defendant denies the allegations contained in this paragraph.
61. Defendant hereby incorporates each and every paragraph listed above as if fully set forth herein verbatim.

62. Defendant denies the allegations contained in this paragraph.

63. Defendant admits that a release of lien has not been executed as of this paragraph but will be forthcoming.

64. Defendant denies the allegations contained in this paragraph.

WHEREFORE, Defendant denies any and all allegations not specifically admitted herein and requests that this Court dismiss Plaintiff's action and cast all costs against it.

/s/ Nathan E. Huff
Nathan E. Huff, ID 12311
nhuff@cwhllp.com

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day he has filed the foregoing with the Clerk of Court's CM/ECF which will serve opposing party the foregoing electronically.

This 15th day of May, 2019.

/s/ Nathan E. Huff